

1 Law Office of Mark McClure, PS
2 1103 West Meeker Street, #101
3 Kent, WA 98032

The Honorable Brian D Lynch
Chapter 11

4
5 UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF
6 WASHINGTON AT TACOMA

7
8 In Re,

9 Stephen Robert Brown,
10 Debtor.

Case No.: 22-40997-BDL

DECLARATION OF DEBTORS'
ATTORNEY MARK MCCLURE IN
SUPPORT OF APPLICATION FOR
EMPLOYMENT

11
12
13
14 Mark McClure, states under penalty of perjury of the laws of the State of Washington:

- 15
16 1. I am an attorney at law, duly admitted to practice in the state of Washington and in the
17 United States District Court for the Western District of Washington. I have personal
18 knowledge of the facts set forth herein and competent to testify to the same.
19
20 2. To the best of knowledge of the undersigned, I or the Law Office of Mark McClure, PS,
21 presently have a connection nor business dealing with the Debtor, creditor, any party in
22 interest, their respective attorneys and accountants. Mr. Iwama, presently an attorney of
23 the Law Office of Mark McClure, PS is filing a contemporaneous declaration regarding
24 the involvement of his old law firm, Iwama Harper PLLC and its involvement as a
25 Trustee for the Deed of Trust identified below and the subsequent assignment of that
26 responsibility.
27
28
29
30

DECLARATION OF DEBTORS'
ATTORNEY IN SUPPORT OF
APPLICATION FOR EMPLOYMENT

1
Law Office of Mark McClure, P.S.
1103 W Meeker St, Ste 101
Kent, WA 98032
253-631-6484

- 1 3. To the best of my knowledge, neither I nor employees of the Law Office of Mark
2 McClure, PS hold any interest adverse to the estate.
- 3 4. Other attorneys that are employees of Law Office of Mark McClure, PS who may work
4 on this matter include Masafumi Iwama and Ian Hatch. Any reference to “Iwama” in the
5 Fee Agreement is a scrivener’s error and should be interpreted as the Law Office of Mark
6 McClure, PS.
- 7 5. Neither I nor employees of the Law Office of Mark McClure, PS are pre-petition
8 creditors or have a security interest in the property of the estate to secure fees.
- 9 6. I believe I am disinterested for purposes of § 104 (14) of the Bankruptcy Code.
- 10 7. I have reviewed Local BR 2016 and I am familiar with same.
- 11 8. Initial Retainer was received from Stephen Robert Brown, the debtor on this matter on or
12 about August 9, 2022. Debtor took a loan against his home in the amount of \$500,000
13 and additional retainer was received on August 10, 2022 and credited against the account
14 on August 11, 2022 prior to the filing of the matter. After payment of pre-petition fees
15 and the filing fee, there remains a balance of \$494,641.70 in counsel’s IOLTA account
16 and these funds have been identified in Schedule A/B as an asset of the estate.
- 17 9. We are employed as general counsel under 11 U.S.C 327(a).
- 18 10. A copy of my Engagement Agreement, Application for Employment and Declaration
19 were forwarded to the U.S. Trustee’s office on September 2, 2022.

20 Signed at Kent, Washington, this 27th day of September, 2022.

21 /s/ Mark C. McClure

22 Mark C. McClure, WSBA #24393
23 Attorney for Debtors
24
25
26
27
28
29
30